

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
Southern Division**

George Webb Sweigert,

Plaintiff,

-against-

**CASE: 2:20-cv-12933-GAD-KGA**

Cable News Network

Defendant.

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Non-party declarant  
D. G. SWEIGERT, C/O  
AMERICA'S RV  
MAILBOX, PMB 13339  
514 Americas Way, Box  
Elder, SD 57719  
[Spoliation-notice@mailbox.org](mailto:Spoliation-notice@mailbox.org)

Plaintiff  
GEORGE WEBB SWEIGERT  
209 ST. SIMONS COVE,  
PEACHTREE, GA 30269-4201  
503-919-0748  
[Georg.webb@gmail.com](mailto:Georg.webb@gmail.com)

Jason Goodman  
252 7<sup>th</sup> Avenue #6s  
New York, NY 10001  
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[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)  
Pro Se

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41000 Woodward Avenue  
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**DECLARATION OF D. G. SWEIGERT**

NOW COMES D. GEORGE SWEIGERT, *pro se* non-attorney third-party, to provide an accurate and truthful declaration of the events and persons that have become involved with the subject matter of this lawsuit.

The undersigned's purpose in filing this declaration is to provide the Court with some measure of clarity regarding Q-Anon based conspiracy theorist Jason Goodman (who attended the insurrection at the Capitol on January 6, 2021, along with George Webb Sweigert).

Attached are true exhibits related to Jason Goodman's legal filings in New York City federal court (S.D.N.Y.). The Court will note the emphasis on Q-Anon.

Respectfully submitted on this November 13, 2021



**D. G. SWEIGERT, C/O  
AMERICA'S RV MAILBOX, PMB 13339  
514 Americas Way, Box Elder, SD 57719  
Spoliation-notice@mailbox.org**

### **CERTIFICATE OF SERVICE**

I, hereby certify, under penalties of perjury, that a true copy of the accompanying documents has been filed electronically with pdf copies to all parties.

Jason Goodman  
truth@crowdsourcethetruth.org

George Webb Sweigert  
Georg.webb@gmail.com

L Robin Luce Herrmann (P46880)  
Jennifer A. Dukarski (P74257)  
Javon R. David (P78214)  
luce-Herrmann@butzel.com  
Dukarski@butzel.com  
Davidj@butzel.com

I hereby attest that the foregoing was transmitted November 13, 2021 under the penalties of perjury.



**D. G. SWEIGERT, C/O  
AMERICA'S RV MAILBOX, PMB 13339  
514 Americas Way, Box Elder, SD 57719**

**EXHIBIT ONE**

# MEMO ENDORSED

DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 11/11/2021

IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF NEW YORK

D. GEORGE SWEIGERT

Plaintiff,

vs.

JASON GOODMAN,

Defendant

Case No.: 1:18-cv-08653-VEC-SDA

## NOTICE OF MOTION

Please take notice that JASON GOODMAN, pro se Defendant will move this Court, pursuant to 28 U.S.C. § 144 and 455 of the Federal Rules of Civil Procedure, at a time and date to be determined by the Court, for the recusal or disqualification of Judge Valerie Caproni.

Signed this 10<sup>th</sup> day of November 2021

Respectfully submitted,



Jason Goodman, Defendant, Pro Se  
252 7<sup>th</sup> Avenue Apt 6s  
New York, NY 10001  
(323) 744-7594  
[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)

Application DENIED. *See Lewis v. Tuscan Dairy Farms, Inc.*, 25 F.3d 1138, 1141 (2d Cir. 1994); *Liteky v. United States*, 510 U.S. 540, 555 (1994) (citing *United States v. Grinnell Corp.*, 384 U.S. 563, 583 (1966)).

The Clerk of Court is respectfully directed to close the open motion at docket entry 324.

SO ORDERED.



Date: November 11, 2021

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE

**EXHIBIT TWO**

*D George Sweigert*  
*America's RV Mailbox*  
*514 Americas Way, PMB 13339*  
*Box Elder, SD 57719-7600*  
Email: [SPOLIATION-NOTICE@MAILBOX.ORG](mailto:SPOLIATION-NOTICE@MAILBOX.ORG)

**November 10, 2021**

Hon. Judge Valerie E. Caproni  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**VIA ECF**

REF: 1:18-CV-08653-VEC-SDA, *D. George Sweigert vs. Jason Goodman*

Dear Judge Caproni,

The undersigned is the Plaintiff in this case, a non-attorney.

As you are aware, the pro se Defendant has filed a motion for your disqualification and/or removal as presiding judge in this matter (ECF no. 324).

At the outset, the undersigned calls to the Court's attention the legal reasoning that appears in the Court's ORDER of 8/20/2019, ECF doc. 87, quoted in relevant part:

"As a threshold matter, pro se litigants may not file an affidavit pursuant to 28 U.S.C. § 144. Williams, 287 F. Supp. 2d at 249 ("A pro se party cannot supply a certificate of counsel." (citing Robinson v. Gregory, 929 F. Supp. 334, 337–38 (S.D. Ind. 1996) ("Section 144 strikes a balance by providing both powerful and nearly automatic procedures for disqualification, while requiring counsel's certificate of good faith as a means to prevent abuse."))). Plaintiff's motion, therefore, fails for that reason alone.

and

Finally, "[i]t is well-settled that a party must raise its claim of a district court's disqualification at the earliest possible moment after obtaining knowledge of facts demonstrating the basis for such a claim." Apple v. Jewish Hosp. & Med. Ctr., 829 F.2d 326, 333 (2d Cir. 1987). None of the facts pertaining to the undersigned's former career is new, and Plaintiff has not averred in his affidavit that he only recently became aware of that information. See Morisseau v. DLA Piper, 532 F. Supp. 2d 595, 623 (S.D.N.Y. 2008) (finding waiver because plaintiff "ha[d] not established that plaintiff filed [disqualification papers] as soon as practical after learning of the facts."), aff'd, 355 F. App'x 487 (2d Cir. 2009)."

The Defendant is well aware of this ORDER (ECF 87) and its content as he published several video podcasts discussing the ORDER in great detail. Depicted below is only one example.



<https://www.bitchute.com/video/aDRUFyb54PY/>

Further, the Defendant provided a forum to Robert David Steele on June 13, 2017 where the major tenants of the Q-Anon conspiracy theory were broadcast on CrowdSource The Truth social media network. This included Q-Anon topics such as child trafficking, Vice President Mike Pence and Robert S. Mueller, III acting as traitors, child blood drinking, and other Q-Anon related topics. In the video depicted below the Defendant is seen agreeing with all of these major Q-Anon based conspiracy theories.



<https://rumble.com/vm2gg7-robert-david-steele-on-crowdsource-the-truth-june-13-2017.html>



Signed this tenth day of November (one day before Veteran's Day) 2021. Date 11/10/2021.

Respectfully,

A handwritten signature in black ink, appearing to read "D. Sweigert", with a stylized flourish at the end.

D. George Sweigert  
Veteran U.S. Air Force

#### CERTIFICATE OF SERVICE

The Plaintiff asserts under penalties of perjury that copies of these pleadings have been sent to Jason Goodman on Veteran's Day, 11/10/2021 at [truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org) on this date.